

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

NO. 417-53803-2020

IN THE INTEREST OF

S.L., J.L., AND L.L.,

CHILDREN

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§
§

IN THE DISTRICT COURT

417TH JUDICIAL DISTRICT

COLLIN COUNTY, TEXAS

PETITIONER'S MOTION FOR CONTINUANCE

This *Motion for Continuance* is brought by Michael Long, Petitioner and Father of the children the subject of this suit, who shows in support:

1. This case is presently set for hearing on the Amicus attorney's *Request for Temporary Restraining Order and Motion to Modify Temporary Orders* and Respondent, Kelly Long's *Motion for Further Temporary Orders and Motion for Mental Examination* on September 3, 2020. These motions were filed on August 31, 2020.

2. For good cause shown, counsel for Father requests a continuance.

3. Former counsel for Father was permitted to withdraw on August 31, 2020.

4. The undersigned counsel for Father was retained late on September 1, 2020, and entered an appearance on the morning of September 2, 2020.

5. Father's newly retained counsel has insufficient time to prepare for a hearing on the noticed motions.

6. The motion of the Amicus attorney requests to "abate" Father's parental rights in substantial and significant ways and restrain him from all possession of and access to the children. It would be unjust to conduct a hearing on a motion requesting such extreme relief without permitting Father and his counsel to properly prepare.

7. Temporary Orders were entered in this matter less than two weeks from the filing of

this Motion on August 20, 2020. These Temporary Orders provide for the possession of and access to the children, appointment of counselors for the children, appointment of an expert to perform psychological evaluations of both parties, appointment of an amicus attorney, and enjoin the parties. Nothing has been plead by either the Amicus attorney nor Respondent suggesting these Temporary Orders are insufficient to protect the parties and the children for a period of time sufficient for Father and his counsel to prepare for a hearing on the noticed motions- filed a mere three days from the date of the setting- especially taking into consideration that Respondent is in possession of the children in an undisclosed location, unknown to Father.

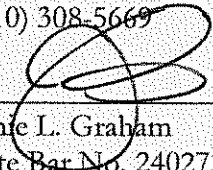
9. This continuance is not sought for delay, but so that justice may be done.

Michael Long prays that the Court grant the Motion for Continuance, and for all other and further relief to which he may be entitled at law or in equity.

Respectfully submitted,

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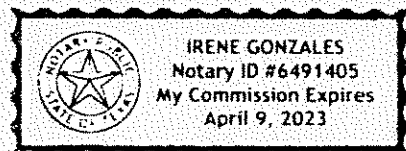
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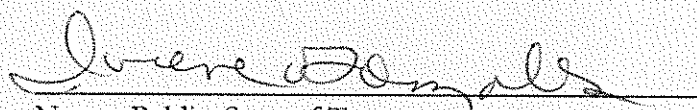
The undersigned states under oath: "I am the attorney for the movant in the foregoing Motion for Continuance. I have read the motion. The statements contained in the motion are within my personal knowledge and are true and correct."



Jamie L. Graham

SIGNED under oath before me on September 2, 2020.





Notary Public, State of Texas

Certificate of Service

This is to certify that, pursuant to Rule 21 of the Texas Rules of Civil Procedure, a true and correct copy of the foregoing document has been served upon the below-named individual in the following manner as prescribed by Rule 21(a) of the Texas Rules of Civil Procedure on this the 2nd day of September, 2020.

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Irene Gonzales on behalf of Jamie Graham
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Envelope ID: 45924702
Status as of 9/2/2020 3:43 PM CST

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Erin Groce	24054546	erin@jamiegrahamlaw.com	9/2/2020 3:23:49 PM	SENT
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Rachel Li	24056892	efs@rachellilaw.com	9/2/2020 3:23:49 PM	SENT